IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

* AMBER IVEY,

Plaintiff,

Case No. 1:20-cv-01995-RDB v.

LINDA H. LAMONE, in her

Official Capacity as

State Administrator of Elections,

Defendant.

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

Amber Ivey, Plaintiff, and Linda H. Lamone, in her Official Capacity as State Administrator of Elections, Maryland Board of Elections, Defendant, by their respective attorneys, move that the Court approve and enter the proposed Consent Judgment attached hereto as Exhibit A. As grounds for the Motion, the Plaintiffs state:

- 1. The proposed Consent Judgment has been negotiated among the parties.
- 2. The proposed Consent Judgment represents a fair, adequate, and reasonable resolution of this action that will benefit all parties while serving the public interest.

Respectfully submitted,

July 20, 2020 _/s/ H. Mark Stichel_

H. Mark Stichel, Bar No. 02939 ASTRACHAN GUNST THOMAS, P.C. 217 East Redwood Street, Suite 2100

Baltimore, Maryland 21202 Telephone: 410.783.3550 Facsimile: 410.783.3530

hmstichel@agtlawyers.com

Counsel for Plaintiff

/s/ Andrea W. Trento

ANDREA W. TRENTO (Fed. Bar No. 28816)
Assistant Attorney General
Maryland Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
atrento@oag.state.md.us
(410) 576-6472
(410) 576-6955 (facsimile)

Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of July, 2020, a copy of the foregoing Joint Motion for Entry of Consent Judgment was served upon all counsel of record via the Court's ECF System.

<u>/s/ H. Mark Stichel</u> H. Mark Stichel, Bar No. 02939